

***COMPOSITE
EXHIBIT “B”***

From: Alex Ershock
Sent: Tuesday, December 12, 2023 9:31 AM
To: Leslie Martinez
Cc: Alicia Kendrick; tanesha@legalopinionusa.com; twallsblyelaw@gmail.com; Robin I. Frank
Subject: RE: Jany Mayo v American Health Reform Solutions - Authorizations

Respectfully, she has had a month to give us a position on the authorizations or to simply return them executed. The first email in this chain is from November 16. Importantly, one of those days during this month was mediation, where she had her client's ear/presence.

Alex B.C. Ershock, Esquire

Attorney

3837 NW Boca Raton Boulevard, Suite 200 | Boca Raton, FL 33431

Main: 561.544.8900 | Facsimile: 561.544.8999

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From: Leslie Martinez <leslie@legalopinionusa.com>
Sent: Tuesday, December 12, 2023 9:27 AM
To: Alex Ershock <ABE@pbl-law.com>
Cc: Alicia Kendrick <ak@pbl-law.com>; tanesha@legalopinionusa.com; twallsblyelaw@gmail.com; Robin I. Frank <RIF@pbl-law.com>
Subject: Re: Jany Mayo v American Health Reform Solutions - Authorizations

Dear Counsel,

Attorney Blye is in an all-day deposition today, please allow her till tomorrow to respond to your email.

Thank you.



Leslie Martinez
Legal Assistant of Tanesha W. Blye, Esq.

The Saenz Law Firm, P.A.
20900 NE 30th Avenue Suite 800
Aventura, FL 33180
305-482-1475 - office
305-209-5779- direct line

www.legalopinionusa.com
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On Tue, Dec 12, 2023 at 9:04 AM Alex Ershock <ABE@pbl-law.com> wrote:

Tanesha,

A reminder that we spoke last Friday, December 8, 2023, and I agreed to give you until noon today to provide your position on the authorizations. Failing that, I am filing a motion to compel.

Alex B.C. Ershock, Esquire

Attorney

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From: Alicia Kendrick <ak@pbl-law.com>
Sent: Thursday, November 30, 2023 11:57 AM
To: tanisha@legalopinionusa.com; twallsblyelaw@gmail.com; Leslie Martinez <leslie@legalopinionusa.com>
Cc: Robin I. Frank <RIF@pbl-law.com>; Alex Ershock <ABE@pbl-law.com>
Subject: Jany Mayo v American Health Reform Solutions - Authorizations

Good morning. Please advise on the status of providing the signed authorizations. If we don't hear from you by the close of business tomorrow, then we will be forced to file a motion to compel.

Thank you.

Alicia Kendrick

Florida Registered Paralegal

Paralegal to Daniel R. Levine, Robin I. Frank and Alex B.C. Ershock

3837 NW Boca Raton Blvd., Suite 200, Boca Raton, FL 33431

Main: 561.544-8900 | Facsimile: 561.544.8999

AK@PBL-Law.com www.PBL-Law.com



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From: Alicia Kendrick
Sent: Thursday, November 16, 2023 2:07 PM
To: tanisha@legalopinionusa.com; twallsblyelaw@gmail.com; Leslie Martinez <leslie@legalopinionusa.com>
Cc: Robin I. Frank <RIF@pbl-law.com>; Alex Ershock <ABE@pbl-law.com>
Subject: Jany Mayo v American Health Reform Solutions - Authorizations

Good afternoon.

Our Request for Production Nos. 20-23 requested medical records and related information and No. 38 requested information which would be associated with any unemployment claim. All of the responsive documents were not produced as many of those would be within records of the medical providers or DEO. Those are obviously within your client's control.

To that end, we intend on issuing subpoenas for those records and are requesting that your client sign the attached HIPPA and DEO release forms.

Please advise whether your client will comply so we know if we need to file a motion with the Court.

Thank you.

Alicia Kendrick

Florida Registered Paralegal

Paralegal to Daniel R. Levine, Robin I. Frank and Alex B.C. Ershock

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